

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

*Plaintiff,*

v.

SAMSUNG ELECTRONIC CO., LTD and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. 2:22-CV-00422-JRG-RSP

**DECLARATION OF BENJAMIN K. THOMPSON IN SUPPORT OF  
SAMSUNG’S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Benjamin K. Thompson, hereby declare under the penalty of perjury as follows:

I am a Principal at Fish & Richardson P.C., counsel for Defendants Samsung Electronic Col, Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively “Samsung”). I am member of the Bar of the State of Georgia and am admitted to this Court. I have personal knowledge of the matters stated in this declaration and would testify to them if called upon to do so.

1. Attached as Exhibit A is a true and correct copy of excerpts of the December 15, 2023 deposition of Alireza Raissinia.

2. Attached as Exhibit B is a true and correct copy of excerpts of the December 18, 2023 deposition of Dr. Douglas Chrissan.

/s/Benjamin K. Thompson

Benjamin K. Thompson